

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***  
***AND RESPONSE TO COMMENTS***

TITLE V/SYNTHETIC MINOR DRAFT PERMIT # V-04-061

ENERSYS

RICHMOND KENTUCKY

JANUARY 24, 2005

FROUGH SHERWANI, P.E., REVIEWER

PLANT I.D. # 21-151-00046

APPLICATION LOG #56596

AI # 39107

**A. SOURCE DESCRIPTION**

EnerSys operates a tube manufacturing facility in Richmond, Kentucky. The Standard Industrial Classification (SIC) Code for this facility is 2295 and the product is resin-coated fiberglass tubing used in the manufacture of tubular positive battery plates. The Tubing Manufacturing Plant is an existing major source for volatile organic compounds (VOCs) and single/combined hazardous air pollutants (HAPs).

**B. COMMENTS;**

1. The source submitted an application on June 04, 2004 to renew their Title V Permit (V-99-070). In addition, the source is also proposing to replace six (6) tube forming machines # 01, 02, 03, 04, 05 and 06 with new machines # EP 1-MP1, MP2, MP3, MP4, MP5 and MP6.

2. Type of control and efficiency:

Emission Points #6 (10 cutters and 2 trimmers) and #01 (10 tube forming machines) are controlled by a dust collection system # 01 with an estimated collection efficiency of 90%.

3. Emission factors and their source:

A combination of material balance and AP-42 emission factors were used to estimate emissions.

4. Applicable regulations:

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 50:012**, General application.

5. Precluded Regulations:

- a. **40 CFR Part 63, Subpart OOOO**, NESHAPS: Printing, Coating, and Dyeing of Fabrics and Other Textiles;
- b. **401 KAR 51:017**, Prevention of significant deterioration of air quality.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. The source has accepted a facility-wide limit on annual VOC emission of no more than 225.0 tons to preclude the applicability of 401 KAR 51:017. The actual VOC emissions shall be calculated based on the 12-month rolling total.
2. The source has accepted a facility-wide limit on annual single HAP emissions of no more than 9.0 tons and combined HAPS of no more than 22.5 tons to preclude the applicability of 40 CFR 63 Subpart OOOO. The actual HAPs emissions shall be calculated based on the 12-month rolling total.

#### **PERIODIC MONITORING:**

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 month emission limitations.

#### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

#### **Comment from EnerSys and Division's Response**

#### **COMMENT**

The correct legal identity of the permittee is "EnerSys" not "EnerSys Inc." We therefore request that all references within the Drat Permit, including the title page, to EnerSys Inc., to be changed to EnerSys.

#### **DIVISION'S RESPONSE:**

The permit and supporting documents have been changed to reflect the comment.